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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA
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8 CHARLANN KAHALEWAI-REYES,
9 Plaintiff,

10 vs.

11 CEMEX NEVADA, LLC a Foreign limited
12 liability company; CEMEX,
MANAGEMENT COMPANY, LLC. a
13 Foreign limited liability company; CEMEX
CONSTRUCTION MATERIALS PACIFIC,
14 LLC, a Foreign limited liability company;
CEMEX CONSTRUCTION MATERIALS
15 SOUTH, LLC a Foreign limited liability
company; JAMES LEUTH, an individual;
16 CINDY ARBOGAST, an individual;
CHRISTOPHER HILL, an individual;
17 STEWART MATE, an individual;
ROBERTO MUNOZ, an individual; and
18 DOES I-X inclusive; and ROES I-X,
inclusive.

19 Defendants.
20

CASE 2:19-CV-00589-JAD-BNW

**STIPULATION AND ORDER
TO EXTEND TIME FOR PLAINTIFF TO
FILE AN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS**

ECF No. 11

21 Plaintiff, Charlann Kahalewai-Reyes, by and through her undersigned counsel of
22 record, Brandon L. Phillips, Esq., of BRANDON L. PHILLIPS, ATTORNEY AT LAW,
23 PLLC, Defendant CEMEX NEVADA, LLC, CEMEX MANAGEMENT COMPANY, LLC,
24 CEMEX CONSTRUCTION MATERIALS PACIFIC, LLC, CEMEX CONSTRUCTION
25 MATERIALS SOUTH, LLC (collectively, "Cemex"), Cindy Arbogast, Christopher Hill, by
26 and through its undersigned counsel of record, of JACKSON LEWIS, P.C., specifically Lisa
27 A. McClane, Esq., hereby stipulate and agree the discovery deadlines in this matter shall
28 be extended as follows:

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FACTS AND PROCEDURAL HISTORY

This case arises from Plaintiff's Complaint for certain alleged misconduct during her employment with the Defendants and their named agents. On April, 12, 2019, Defendants' filed a Motion to Dismiss the Amended the Complaint. This Court set Plaintiff's Opposition for a due date of April 26, 2019. Plaintiff has requested a brief extension to filing an Opposition for one week, until May 3, 2019. The Court granted that extension. However, the Parties have agreed to one additional continuance until **May 6, 2019**. This is the last and final extension allowable, as agreed.

REASONS FOR EXTENSION REQUEST

Plaintiff has requested the continuance of filing the Opposition in good faith, due to current schedule conflicts that made filing the Opposition in a timely manner difficult. As this case is in its infancy there will be no harm to the case or delay in litigating the matter should the Court grant the Motion.

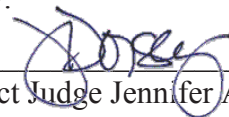
The parties have entered into this stipulation, and request approval from this Court to do so.

SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

Dated: May 3, 2019	Dated: May 3, 2019
BRANDON L. PHILLIPS, ATTORNEY AT LAW, PLLC	JACKSON LEWIS P.C.
<u>/s/ Brandon L. Phillips</u>	<u>/s/ Lisa A. McClane</u>
Brandon L. Phillips, Esq. Nevada Bar No. 12264 1455 E. Tropicana Ave., Ste. 750 Las Vegas, NV 89119 <i>Attorneys for Plaintiff</i>	Lisa A. McClane Nevada Bar No. 10139 3800 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 <i>Attorneys for Defendants</i>

ORDER

Based on the parties' stipulation [ECF No. 11] and good cause appearing, IT IS SO ORDERED. The response [ECF No. 12] is deemed timely.



U.S. District Judge Jennifer A. Dorsey
Dated: May 14, 2019